

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SARAH EDMONDSON, et al.,

Plaintiffs,

v.

KEITH RANIERE, et al.,

Defendants.

1:20-cv-00485-EK-CLP

**DECLARATION IN SUPPORT OF MOTION FOR
WITHDRAWAL AS COUNSEL OF RECORD**

I, CRAIG M. MARTIN, declare and state as follows:

1. I am a member of the firm Willkie Farr & Gallagher (“Willkie Farr”).
2. I submit this affidavit in support of Willkie Farr’s Motion for Withdrawal as Counsel of Record for Defendant Clare Bronfman in the above-captioned matter (the “Matter”). I have set forth the facts below on the basis of my personal knowledge, unless I have indicated otherwise.
3. The Court entered appearances for Willkie Farr (Craig C. Martin and Sara T. Horton) and Ronald Sullivan, on behalf of Ms. Clare Bronfman, on July 13, 2020.
4. Willkie Farr, Ronald Sullivan, and Ms. Clare Bronfman have decided that, pending Court approval, Willkie Farr will withdraw as counsel of record for Ms. Clare Bronfman.
5. Mr. Ron Sullivan and I have discussed this matter, and he acknowledged he will continue as Ms. Clare Bronfman’s counsel in this Matter.
6. Ms. Clare Bronfman consents to Willkie Farr’s withdrawal.

7. Accordingly, Willkie Farr submits the attached Motion.

8. Because Mr. Ronald Sullivan has been representing Ms. Clare Bronfman in this Matter since July 2020, because Mr. Ronald Sullivan will continue to represent Ms. Clare Bronfman in this Matter moving forward, and because discovery has not yet commenced, Willkie Farr's withdrawal will not delay or otherwise interfere with the proceedings in this litigation.

9. Willkie Farr is not asserting a retaining or charging lien on Ms. Clare Bronfman.

10. Accordingly, I respectfully request that the Court grant the motion permitting Craig C. Martin and Sara T. Horton of the firm of Willkie Farr & Gallagher LLP to withdraw as counsel of record for Defendant Ms. Clare Bronfman.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Craig C. Martin
Craig C. Martin